

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

John Dixon,

Plaintiff,

v.

LGX Services LLC,

Defendant.

Case No. 1:23-cv-00703-JMC

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**CORRECTED PLAINTIFF’S RESPONSE IN OPPOSITION TO
DEFENDANT’S MOTION TO DISMISS AND/OR STAY PROCEEDINGS AND
COMPEL ARBITRATION**

The Plaintiff, John C. Dixon, (“Mr. Dixon” or “Plaintiff”), by undersigned counsel, and pursuant to Fed. R. Civ. P. 7(b), submits this Response in Opposition to Defendant’s Motion to Dismiss and/or Stay Proceedings and Compel Arbitration. Plaintiff is entitled to a jury trial because he does not have an agreement with LGX to arbitrate the disputes and claims arising from his employment agreement as operations manager for LGX. Furthermore, there is a material dispute of facts as to the existence of any agreement to arbitrate any disputes or claims arising from Plaintiff’s employment agreement as the operations manager for LGX.

In support of Plaintiff’s Response in Opposition to the Motion to Dismiss and/or stay proceedings and compel arbitration, Plaintiff directs the court to the accompanying memorandum of points and authorities supporting Plaintiff’s Opposition to the Motion to Dismiss and/or Stay Proceedings and Compel Arbitration. Plaintiff asks the Court to deny Defendant’s Motion to Dismiss and/or stay proceedings and compel arbitration on the grounds set forth.

Respectfully Submitted,

/s/ George A. Rose

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Attorney for *Plaintiff John C. Dixon*

CERTIFICATE OF SERVICE

I hereby certify that on this 22 day of May 2023, a copy of the foregoing was served on all counsel of record by the Court's CM/ECF system.

/s/ George A. Rose